

Before the FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of 2002 Biennial Regulatory Review -
Review of the Commission's Broadcast Ownership Rules
and Other Rules Adopted Pursuant to Section 202
of the Telecommunications Act of 1996,
Notice of Proposed Rulemaking,
MM Docket No. 02-277, (rel. Sept. 23, 2002)

To: The Secretary, FCC Commissioners, and Chief, Media Bureau

As a member of Unitarian Universalists for a Just Economic Community Media Democracy Task Force, Pennsylvania Chapter, I am writing to comment on Docket No. 02-277, The Biennial Review of the FCC's broadcast media ownership rules. I strongly believe that the FCC should retain all of the current media ownership rules now in question. Both as a former journalist and media activist I know that present rules serve the public interest by limiting the market power of already huge companies in the broadcast industry.

Both Business Week magazine and William Safire of the New York Times have warned of the serious consequences to democracy in America should further deregulation and consolidation be permitted. Hard news coverage has decreased 35% since media conglomerates have expanded their influence.

Furthermore, I do not believe that the studies commissioned by the FCC accurately demonstrate the negative effects media deregulation and consolidation have had on media diversity. While there may be indeed be more sources of media than ever before, the spectrum of views presented have become more limited. The negative impact of Clear Channel Communications on diverse radio programming demonstrates how deregulation clearly silences needed voices by their overwhelming corporate power.

Additionally, I think there is a national security interest in having local stations with staff available to cover and instruct citizens in the event of local attacks. Huge broadcasting giants like Clear Channel have no human presence in too many areas where they dominate the airwaves. This also holds true for television ownership. It is my understanding that in Kansas, some local news programming has been cancelled altogether.

Our nation was founded on principles of informed debate and discussion of current events. Along with our forefathers, I believe that democracy is best served by a diverse marketplace of ideas. If the FCC allows our media outlets to merge, our ability to have open, informed discussion with a wide variety of viewpoints will be compromised. Obviously, even under current rules, corporate media owners fail to present sufficient political debate. Time for such issues has been continual curtailed in recent elections cycles despite licenses that demand public interest programming.

The public interest will best be served by preserving media ownership rules in question in this proceeding.

In addition, I support the FCC's plan to hold a public hearing on this matter in Richmond, VA in February 2003. I strongly encourage the Commission to hold similar hearings in all parts of the country and

solicit the widest possible participation from the public which will be the most directly affected by the outcomes of these decisions. I think it is important for the FCC to not only consider the points of view of those with a financial interest in this issue, but also those with a social or civic interest.

With the serious impact these rule changes will have on our democracy, it is incumbent on the Commission to take the time to review these issues more thoroughly and allow the American people to have a meaningful say in the process.

Thank you,

Lilly Gioia, UUJEC
Media Task Force
Pennsylvania Chapter